

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HAROLD PETRISCH,	:
	:
Plaintiff,	:
	:
- against -	:
	:
JP MORGAN CHASE, PHYLLIS PRESSA and	:
RHONDA DUAWAY,	:
	:
Defendants.	:
-----X	

08 CIV 4479 (DC)

**DISCLOSURES PURSUANT
TO RULE 26(A) OF THE
FEDERAL RULES OF
CIVIL PROCEDURE**

JPMorgan Chase Bank, National Association ("JPMC"), erroneously named herein as JP Morgan Chase, Phyllis Pressa and Rhonda Dauway, erroneously named herein as Rhonda Duaway (hereafter collectively referred to as "Defendants"), by its attorneys, the JPMorgan Chase Legal Department, respectfully submit its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) as follows:

A. The names and, if known and presently available, the address and telephone numbers for individuals likely to have discoverable information relevant to the facts alleged in Plaintiff's Complaint are: Phyllis Pressa and Ronda Duaway. These individuals may be contacted via Tara A. Griffin, Assistant General Counsel, JPMorgan Chase Legal Department, One Chase Manhattan Plaza/26th Floor, New York, New York 10081; (212-552-5101).

B. Documents, data compilations, and tangible things that are relevant to disputed facts alleged with particularity in the pleadings include:

1. Employee records and accessHR files for Plaintiff;
2. Employee Profile Data forms for Plaintiff;

3. Files maintained or obtained by JPMC's Human Resources Department concerning Plaintiff;
4. Files maintained by Plaintiff's management, if any;
5. Documentation related to the Series 6 licensing examination;
6. Documentation relating to Assistant Branch Managers and Personal Bankers at JPMC;
7. Business organizational charts;
8. Relevant correspondents including, without limitation, electronic mail correspondence;
9. JPMC Corporate Human Resource Policies; and
10. JPMC Code of Conduct.

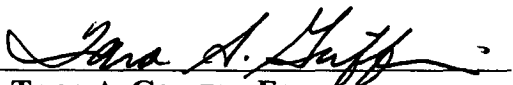
Copies of the documents referred to above will be provided to Plaintiff upon Defendant's receipt of a Stipulation and Order of Confidentiality which has been executed by Plaintiff and his attorneys and "So Ordered" by the Court. In the meantime, such documents are available for inspection, by appointment, at the offices of the JPMorgan Chase Legal Department, One Chase Manhattan Plaza, 26th Floor, New York, New York 10081, Attn: Tara A. Griffin, (212) 552-5101.

C. The provisions of Federal Rule of Civil Procedure 26(a)(1)(C) are not applicable at this time because Defendant currently is not seeking damages from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement their response as appropriate.

Dated: New York, New York
July 17, 2008

JPMORGAN CHASE LEGAL DEPARTMENT

By: 
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